## UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA FLORENCE DIVISION

Johnna Williams	)
Plaintiff,	)
v.	) Plaintiff's Answers to Local
	) Rule 26.01 Interrogatories
Bank of America, National	)
Association,	)
	)
Defendant.	)

## PLAINTIFF'S ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES

Comes now the Plaintiff, Johnna Williams, by and through the undersigned counsel of record, and hereby files his Answers to Local Rule 26.01 Interrogatories pursuant to the Local Rules of the United States District Court for the District of South Carolina as follows:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

## ANSWER: None.

B. As to each claim, state whether it should be tried by jury or nonjury and why.

ANSWER: The Plaintiff is entitled to and seeks a trial by jury on all claims set forth in her Complaint.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten

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percent or more of the outstanding shares or other indicia of ownership of the party;

and (3) each publicly owned company in which the party owns ten percent of more

of the outstanding hares.

ANSWER: The Plaintiff in this matter is an individual.

D. State the basis for asserting the claim in the division in which it was filed (or the basis

of any challenge to the appropriateness of the division).

ANSWER: The Florence Division is the appropriate venue for this case because

the alleged facts underlying Plaintiff's claims occurred in part in Florence, South

Additionally, the Plaintiff resides in Florence County and the Carolina.

Defendant conducted business in Florence County.

Ε. Is this action related in whole or in part to any other matter filed in this District,

whether civil or criminal? If so, provide: (1) a short caption and the full case number

of the related action; (2) an explanation of how the matters are related; and (3) a

statement of the status of the related action. Counsel should disclose any cases which

may be related regardless of whether they are still pending. Whether cases are related

such that they should be assigned to a single judge will be determined by the Clerk of

Court based on a determination of whether the cases: arise from the same or identical

transactions, happenings, or events; involve the identical parties or property; or for

any other reason would entail substantial duplication of labor if heard by different

judges.

ANSWER: No.

/s/ Penny Hays Cauley

Penny Hays Cauley, Fed. ID No. 10323 HAYS CAULEY, P.C. 1303 W. Evans St. Florence, SC 29501 (843) 665-1717 (843) 665-1718 Facsimile phc917@hayscauley.com Attorney for Plaintiff

December 19, 2014 Florence, South Carolina